

## Civil Rights

### TPB Process

COG, as the administrative agency for TPB, is responsible for leading the development of the Title VI Plan and Program. COG has designated our Attorney, Sharon Pandak, to lead all activities related to Title IV implementation and federal DBE requirements.

- All procurement-related Title VI and DBE issues are managed through the COG Office of Finance and Administrative Services.
- Interaction with the public through the transportation planning process is managed by the COG Department of Transportation Planning, as most interaction with the public occurs through the transportation planning process and related federal requirements. All interaction is governed by the 2020 TPB Participation Plan.
- COG is a subrecipient of FHWA PL and Section 5303 funding. TPB does not pass through funding to subrecipients.
- COG is a direct recipient of Section 5310 funding (not TPB). Title VI oversight is provided through the FTA Triennial Review process. The TPB/MPO is involved by assisting COG in 5310 project selection (through an independent and objective selection committee) and does not provide funding or otherwise participate in the program.

### What Is New?

- The [COG Title VI Plan](#) was approved in May 2021.
- The [COG Title VI Program](#) was approved in May 2021. FTA approved the Title VI Program on June 24, 2021. The program has been declared effective from August 1, 2021 through July 31, 2024.
- Visualize 2045, the TPB's recently approved long-range transportation plan of record, added details specifically identifying how Title VI activities were carried out in the development of the plan - [Appendix H: Public Participation Summary: Public Outreach and the TPB Participation Plan](#)

### Next Steps

- Staff will continue to receive Title VI training annually.
- All public outreach activities will follow all Title VI Plan and Program procedures.
  - Outreach is scheduled for the Visualize 2050 development in Fall 2023 and Fall 2024.
  - Another public outreach survey, following up on our successful Voices of the Region outreach campaign, will occur in 2024 or 2025.
- The FTA's Title VI Approval letter suggests that the MPO/TPB is involved in pass-through FTA funding to subrecipients and proceeds to note deficiencies in that regard. MPO/TPB is a subrecipient of Section 5303 funds. However, the MPO/TPB uses all the FTA funding in its planning role, and it does not pass-through funding, and a response letter is forthcoming. The letter will make clear the fact that the MPO/TPB uses all the FTA funding in its planning role, and it does not pass-through funding. Furthermore, COG is a direct recipient of Section 5310 funding (not TPB). The TPB/MPO is involved by assisting COG in 5310 project selection (through an independent and objective selection committee) and does not provide funding or otherwise participate in the program.